

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

[illegible]

UNITED STATES OF AMERICA

-v-

TAHIR ALI KHAN,  
a/k/a "Waheed Khan,"  
a/k/a "Ali,"  
a/k/a "Haji,"  
a/k/a "Shan,"

FAYYAZ AHMED,  
ARIE BENSHIMON,  
a/k/a "the Jew,"  
a/k/a "Jewish Guy,"

NAVEED ALI BHINDAR,  
a/k/a "Sheikh,"

SYED HASSAN,  
MUHAMMAD ISHAQ,  
a/k/a "Saqi,"

BASHARAT JARRAL,  
a/k/a "Alex,"

NADEEM KHAN,  
GHULAM MEHMOOD,  
a/k/a "Mama,"  
a/k/a "Zafar,"

SHAHEEN MUKHTAR,  
a/k/a "Nick,"

QAISER QURESHI,  
a/k/a "Auntie,"

FRANKLIN RODRIGUEZ,  
a/k/a "Spanish Guy,"  
a/k/a "Chancey,"

OSCAR SANCHEZ,  
a/k/a "Charsi,"  
a/k/a "Bank of America,"

SYED SHAH,  
a/k/a "Faisal,"  
a/k/a "Chotu,"  
a/k/a "Joji,"

PRADIPT SHARMA,  
a/k/a "the CitiBank guy,"

Defendants.

[illegible]

Pursuant to United States v. Grammatikos, 633 F.2d 1013, 1024 (2d Cir. 1980), the Government respectfully gives notice that the property subject to forfeiture as a result of the offenses described in the Indictment as alleged in the Forfeiture Allegations, includes the following:

1. all right, title and interest in the real property and appurtenances known as [REDACTED] Carteret, New Jersey 07008, as well as any and all contents of that real estate property, including but not limited to furniture, furnishings, appliances, and electronics, including but not limited to those properties listed in Exhibit A;
2. all right, title and interest in the real property and appurtenances known as [REDACTED] Hoover, Alabama 35244-3294, as well as any and all contents of that real estate property, including but not limited to furniture, furnishings, appliances, and electronics, including but not limited to those properties listed in Exhibit B;

The Government further gives notice that, as an independent and separate basis, these above-described properties are forfeitable as substitute assets, pursuant to Title 21, United States Code, Section 853(p), as specified in the Indictment.

Dated: New York, New York  
August 28, 2007

Respectfully Submitted,

MICHAEL J. GARCIA  
United States Attorney

By: Lisa Zornberg / SK  
LISA ZORNBERG  
Assistant United States Attorney  
Telephone: (212) 637-2720

AFFIRMATION OF SERVICE

RENEE SPILKER, pursuant to Title 28, United States Code, Section 1746, hereby declares under the penalty of perjury:

That I am employed at the Office of the United States Attorney for the Southern District of New York. That upon the electronic filing of the following document, on August 28, 2007, I caused one copy of the attached Government's Forfeiture Bill of Particulars to be delivered by mail and ECF to:

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Counsel for Pradipt Sharma

I declare under penalty of perjury under the laws of the  
United States of America that the foregoing is true and correct.

Dated: New York, New York  
August 28, 2007

  
RENEE SPILKER

# **EXHIBIT A**

**EXHIBIT A****Partial Inventory of Items Observed at [REDACTED]  
Carteret New Jersey, on August 15, 2007**

Location	Item
Family Room	Sony Bravia, Serial # 8015025
	Linksys Wireless Router, Serial # CGNBIG215063
	Cable Modem
	Leather Couch
	Computer Table
Laundry Room	Dryer - Kenmore 80 Series, Serial # MH3610500
	Washer - Kenmore 70 Series, Serial # SM9710804-A
Other Room	Firestorm Rhino Bike
	Schwinn Rhythm Bike
	Strawberry Bike
	Dewalt Sawzall, Serial # 16130920071049
	Dell TV, Serial # 74N7CC1
Garage	Toro Lawnmower, UPC # 2013820076
	Leafblower, Serial # TK0462061
	Toro Weedwacker, Serial # 033288
	Hedge Trimmer - B & D
	Dewalt Drill, Serial # 34905820070749
TV Room	Sony Bravia, Serial # 800986
	Bose Sound System, Serial # AM272176-00102
	Fan / Air Purifier - Lasko
	Couch 1
	Couch 2
Dining Room	Bedding
	Dining Room Table & Chairs - Pulaskic (?) Furniture
	China Cabinet
Kitchen	Cuisnart Microwave, Serial # 060847390101440
	Kenmore Refrigerator, Serial # SE4547749
Master Bedroom	Bedside Table - 1 & 2
	Bedroom Bureau with Mirror
	Bedroom Dresser
	Bedroom Bed
Bedroom	Children's Bed
	Monitor, Serial # 9376BCA00002
Bedroom	Bed
	Monitor, Serial # CNN7050MT01
	Toshiba TV/DVD, Serial # BCB560000535
	Computer Table & Chair
Other	Vaccum Cleaner - Hoover Windtunnel, Serial # 38528-035
	Planter (x2)
	Landscaping Bricks

Patio Table, Chairs, and Umbrella (5 Chairs and 1 Bench)  
Grill - Charmglow, Serial # 7500-S-0703T0313 26  
Bricks in Landscaper's Van  
Canon Digital Video Camera DC210, Bar Code 642442042668

# **EXHIBIT B**



**EXHIBIT B****Partial Inventory of Items Observed at [REDACTED]  
Alabama on August 15, 2007**

<b>Location</b>	<b>Item</b>
Guest Room 1	Wood bed frame with headboard Mattress and Boxspring Two Wood night tables Two Gold and Crystal lamps Wood dresser with mirror Tall wood dresser Area Rug
Living Room	Brown and beige window drapes Taupe/Yellow leather sofa Taupe/Yellow leather chair Taupe/Yellow leather chaise lounge Five gold and crystal coffee tables Two Beige leather sofas Beige leather chair 70" flat screen television DVD player Surround sound system with speakers Coffee Table Two ceiling fans Carpeting Two area rugs Large blue fountain Ceramic type fountain
Dining Room	Dining Table with 8 chairs Wood china cabinet with china Wood bench Crystal chandelier Large vase Marble/granite flooring
Child's Room	Dark wood dresser with mirror Two area rugs
Entryway	White Table with mirror Crystal chandelier Marble/granite flooring
Kitchen	Refrigerator Range with hood Dishwasher Two Ovens Trash compactor Marble/granite flooring

	Microwave
	Seven white chairs
	Wall clock
	Skylight
Master Bedroom	Bed Frame with mattress and mirrored headboard
	Two attached side tables with glass shelves and mirrors
	Dresser with glass shelf and mirror
	Crib
	Carpeting
	Four area rugs
	Blue recliner
	Three drawers of assorted jewelry
Wood Deck	Gas Grill
	Metal Table with four metal chairs
	Glass top table with four black chairs
	Pontoon Boat
	Satellite dish
Front of House	Large stone lion
	Three tier stone fountain
Laundry Room/Garage	Two dryers
	Washing machine
Guest Room 2	Two area rugs
	Dark leather sectional couch
	Two glass top tables
	Dark wood bed frame with headboard and mattress
	Two dark wood night tables
	Dark wood dresser with mirror
	Tall dark wood dresser
	Wood wall hanging
Upstairs	Glass top table with six chairs
	Two blue couches